

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

---

**GEORGE WELCH**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO.: 3:20-cv-122-NBB-JMV**

**CITY OF HERNANDO, MISSISSIPPI, ET AL.**

**DEFENDANTS**

---

**PLAINTIFF'S RESPONSE IN OPPOSITION OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

---

Plaintiff, George Welch, by and through undersigned Counsel, respectfully submits his response in opposition of Defendants' Motion for Summary Judgment. Defendants are not entitled to summary judgment as there remains genuine issues of material fact, which precludes summary judgment. Plaintiff submits his memorandum in opposition to Defendants' motion, which lays out why summary judgment should be denied, to be filed contemporaneously. Furthermore, Plaintiff submits the following to be exhibits to his response and memorandum in opposition of Defendants' motion:

Exhibit "A" – George Welch Deposition transcript excerpts

Exhibit "B" – Dispatch Log

Exhibit "C" – Calls for Service View Call Report dated March 29, 2017

Exhibit "D" – Officer Brian Bell Deposition transcript excerpts

Exhibit "E" – Calls for Service View Call Report dated December 23, 2018

Exhibit "F" - Incident Narratives dated December 23, 2018

Exhibit "G" - Desoto County Court hearing transcript excerpts

Exhibit "H"- Officer Joseph Harris Deposition transcript excerpts

Exhibit "I" – Taser Log

Exhibit "J" – Hernando Municipal Court Orders

Exhibit "K" – Photos of George Welch's injuries

Exhibit "L" – Lieutenant Robert Scott Deposition transcript excerpts

Exhibit "M" – Chief Scott Worsham Deposition transcript excerpts

Exhibit "N" – Officer Joseph Harris certificate

Exhibit "O" – Bankruptcy Schedule

For the reasons stated in his memorandum, Plaintiff respectfully prays this Court deny

Defendants' motion for summary judgment.

Respectfully submitted this 13<sup>th</sup> of July 2021,

ATTORNEYS FOR PLAINTIFF

/s/ John Keith Perry, Jr.

John Keith Perry, Jr., MSB No.: 99909

Garret T. Estes, MSB No. 105517

**PERRYGRIFFIN, P.C.**

5699 Getwell Road

Building G, Suite 5

Southaven, MS 38672

Tele: (662) 536-6868

Fax: (662) 536-6869

Email: [JKP@PerryGriffin.com](mailto:JKP@PerryGriffin.com)

[GE@PerryGriffin.com](mailto:GE@PerryGriffin.com)

**CERTIFICATE OF SERVICE**

I certify that I have this day electronically filed the forgoing with the Clerk of the Court, using the CM/ECF system, which sent notification to the following counsel of record:

G. Todd Butler, MB #102907  
Mallory K. Bland, MB #105665  
4270 I-55 North  
Jackson, Mississippi 39211-6391  
Post Office Box 16114  
Jackson, Mississippi 39236-6114  
Telephone: 601-352-2300  
Telecopier: 601-360-9777  
Email: [Todd.Butler@phelps.com](mailto:Todd.Butler@phelps.com)  
[Mallory.Bland@phelps.com](mailto:Mallory.Bland@phelps.com)

This the 13<sup>th</sup> day of July 2021.

**/s/ John Keith Perry, Jr.**  
John Keith Perry, Jr.